

Dual-License Strategy for Nigeria Operations

Streamlined Regulatory Pathway: Two Licenses, Maximum Impact

\$500 Billion Economic Development Initiative | January 2026

Strategic Rationale: Two Licenses, Complete Coverage

Rather than pursuing multiple licenses across numerous regulatory agencies, NVC Fund Holdings adopts a **dual-license strategy** that provides complete operational coverage while minimizing bureaucratic complexity. By **over-capitalizing two primary entities**, NVC achieves regulatory simplicity, faster deployment, and concentrated institutional relationships.

Advantage	Single Entity Approach	Multi-License Approach
Regulatory Relationships	2 primary regulators (CBN focus)	5+ agencies (CBN, SEC, NAICOM, etc.)
Compliance Burden	Consolidated reporting, unified audit	Multiple reporting frameworks, separate audits
Capital Efficiency	Over-capitalized, demonstrates commitment	Capital spread thin across entities
Timeline to Operations	12-18 months for full deployment	24-36 months for all licenses
Political Engagement	Focused relationship with CBN leadership	Diluted attention across agencies

License 1: Development Finance Institution (DFI)

The DFI license under CBN's 2015 Guidelines provides the optimal foundation for NVC's developmental mandate. This license is specifically designed for entities focused on long-term financing of priority sectors.

Proposed Entity: NVC Development Bank of Nigeria

Specification	Details
Minimum Capital (CBN)	NGN 10 billion (~\$6.5 million USD)
NVC Proposed Capital	NGN 1.5 trillion (~\$1 billion USD) - 150x minimum requirement
Regulatory Authority	Central Bank of Nigeria (CBN) - Development Finance Department
Operational Scope	Long-term project finance, infrastructure, agriculture, housing, SME development
Lending Terms	Concessional rates permitted; 5-25 year tenors aligned with project lifecycles
Funding Sources	Accept funds from governments, IFIs, development partners, capital markets
Partnership Authority	Wholesale lending to commercial banks, MFIs, and specialized institutions

Sector Coverage via DFI License

Sector	Investment Allocation	DFI Authority
Infrastructure	\$150 billion	Roads, bridges, rail, ports - core DFI mandate
Energy & Power	\$80 billion	Generation, transmission, renewables - development priority
Agriculture	\$60 billion	Agribusiness, processing, storage - CBN anchor borrower eligible

Housing	\$50 billion	Affordable housing, mortgage refinancing - FMBN partnerships
Manufacturing	\$60 billion	Industrial parks, factories - job creation mandate
Education & Health	\$40 billion	Social infrastructure - concessional terms permitted
Technology & Innovation	\$30 billion	Digital infrastructure, innovation hubs
Research & Development	\$30 billion	Applied research, technology transfer

License 2: International Commercial Banking License

The International Commercial Banking license provides full-service banking capabilities with authorization for cross-border operations, correspondent banking, and foreign exchange. This license enables NVC to move capital internationally and establish relationships with global financial institutions.

Proposed Entity: NVC International Bank Nigeria Limited

Specification	Details
Minimum Capital (CBN)	NGN 500 billion (~\$325 million USD) - highest tier
NVC Proposed Capital	NGN 3 trillion (~\$2 billion USD) - 6x minimum, largest private bank
Regulatory Authority	Central Bank of Nigeria (CBN) - Banking Supervision Department
International Operations	Authorized offshore banking, international branches, subsidiaries
Correspondent Banking	Direct relationships with global banks (JPMorgan, Citi, HSBC, etc.)
FOREX Operations	Full foreign exchange dealer license, trade finance, LC issuance
Treasury Operations	Interbank lending, money market, sovereign securities trading

Critical Functions via International Banking License

Function	Capability	Strategic Value
Capital Repatriation	Wire transfers, SWIFT, RTGS	Move \$500B into Nigeria via authorized channels
Trade Finance	Letters of credit, guarantees	Support import of equipment, materials for projects
FOREX Treasury	Spot, forward, swap transactions	Manage currency risk on USD/NGN positions
Correspondent Network	Nostro/Vostro accounts globally	Direct access to international payment rails
Syndication Agent	Lead arranger for large transactions	Bring international capital alongside NVC funds
Project Escrow	Escrow and trustee services	Secure disbursement controls for investments

Combined Capitalization: \$3 Billion Total

By deploying \$3 billion in regulatory capital across two entities, NVC demonstrates extraordinary commitment and financial strength. This over-capitalization strategy provides several advantages:

Entity	Capital	Multiple of Minimum	Nigerian Ranking
NVC Development Bank of Nigeria	\$1 billion (NGN 1.5T)	150x CBN minimum	Largest DFI by capital
NVC International Bank Nigeria	\$2 billion (NGN 3T)	6x CBN minimum	Largest private bank by capital
Combined NVC Nigeria	\$3 billion	-	Dominant financial institution

Implementation Timeline

Phase	Timeline	Activities
1. Pre-Application	Months 1-3	Stakeholder engagement with CBN Governor, legal entity formation, document preparation
2. DFI Application	Months 4-9	Submit DFI license application, CBN review, provisional approval, capital deposit
3. ICB Application	Months 6-15	Submit International Banking application (parallel track), fit and proper review
4. DFI Operations	Month 10+	Begin developmental lending operations, first project disbursements
5. ICB Operations	Month 16+	Full banking operations, correspondent relationships, FOREX desk active
6. Full Deployment	Month 18+	Both entities fully operational, \$500B deployment pipeline active

Strategic Advantage: Simplicity Through Scale

The dual-license approach positions NVC as the most significant financial institution in Nigerian history through **focused scale rather than fragmented complexity**. With \$3 billion in combined regulatory capital - far exceeding any existing Nigerian institution - NVC commands immediate respect and attention from regulators, government, and markets.

Key Principle	Implementation
Fewer Regulators	Single relationship with CBN covers both licenses - no SEC, NAICOM, or other agencies required
Over-Capitalization	Capital levels 6-150x minimums signal permanence, commitment, and financial strength
Complementary Mandates	DFI handles development lending; ICB handles capital movement and international operations
Accelerated Approval	Unprecedented capital levels incentivize CBN to fast-track approvals for economic impact
Market Dominance	Combined capital exceeds all Nigerian banks combined - immediate tier-1 status